

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

LEON BLACK,

Defendant.

1:23-cv-06418

STIPULATION

WHEREAS, on July 25, 2023, Plaintiff Jane Doe (“Plaintiff”) commenced this action by filing a Summons and Complaint, Dkt. No. 1,

WHEREAS, on August 28, 2023, this Court extended the deadline for Defendant Leon Black (“Defendant”) to answer or otherwise respond to the Complaint from September 14, 2023 to September 29, 2023, Dkt. No. 18,

WHEREAS, on September 20, 2023, Defendant filed his Motion for Sanctions, pursuant to Fed. R. Civ. P. 11 (c) (the “Motion for Sanctions”), Dkt. No. 22,

WHEREAS, Plaintiff’s response to Defendant’s anticipated Motion to Dismiss is currently due October 13, 2023, and Defendant’s reply in support of his anticipated Motion to Dismiss is currently due October 20, 2023,

WHEREAS, Plaintiff’s response to Defendant’s Motion for Sanctions is currently due October 4, 2023, and Defendant’s reply in support of his Motion for Sanctions is currently due October 11, 2023,

WHEREAS, Plaintiff’s counsel requires additional time for both responses and the parties have agreed to extend the briefing deadlines for these two motions;

NOW THEREFORE, the parties hereby stipulate and agree that:

1. The deadline for Plaintiff's opposition to Defendant's Motion for Sanctions is extended from October 4, 2023 to October 18, 2023;
2. The deadline for Defendant's reply in support of his Motion for Sanctions is extended from October 11, 2023 to October 30, 2023;
3. The deadline for Plaintiff's response to Defendant's anticipated Motion to Dismiss is extended from October 13, 2023 to November 3, 2023; and
4. The deadline for Defendant's reply in support of his anticipated Motion to Dismiss is extended from October 20, 2023 to November 17, 2023.

STIPULATED AND AGREED:

Dated: September 25, 2023
New York, New York

By: /s/Susan Estrich
Susan Estrich (*pro hac vice*)
ESTRICH GOLDIN LLP
947 Berkeley Street
Santa Monica, California 90403
(213) 399-2132

Michael B. Carlinsky
Jennifer J. Barrett
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

Peter A. Gwynne
E. Danya Perry
PERRY LAW
157 East 86th Street, 4th Floor
New York, New York 10028
(646) 974-0935

Counsel for Defendant Leon Black

By: Meredith Firetog
Meredith A. Firetog
Jeanne M. Christensen
WIGDOR LLP
85 Fifth Avenue, 5th Floor
New York, New York 10003
(212) 257-6800

Counsel for Plaintiff Jane Doe

SO ORDERED.

Jessica Clarke

JESSICA G. L. CLARKE
United States District Judge

Dated: September 26, 2023
New York, New York